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**MAY 21, 2008**

MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

**RECEIVED**  
May 21, 2008  
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MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT

RONNIE DANIELS (#20070064180)

(Enter above the full name  
of the plaintiff or plaintiffs in  
this action)

vs.

(Simon #18864), (Jimenez #14101),  
(Cianflone #18206), (Eng #19079),  
(VanVranken #2322), (Fleming #6063),  
(Papaiannow #7644), (Panagiotopoulos #7915)  
Chicago Police Department Officers  
Of The 18<sup>th</sup> District

(Enter above the full name of ALL  
defendants in this action. Do not  
use "et al.")

Case No: 08 C 1727  
(To be supplied by the Clerk of this Court)

Judge: Amy J. St. Eve

CHECK ONE ONLY:

AMENDED COMPLAINT

X

COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983  
U.S. Code (state, county, or municipal defendants)

\_\_\_\_\_

COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE  
28 SECTION 1331 U.S. Code (federal defendants)

\_\_\_\_\_

OTHER (cite statute, if known)

**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR  
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**

**I. Plaintiff(s):**

- A. Name: RONNIE DANIELS
- B. List all aliases: NONE
- C. Prisoner identification number: #20070064180
- D. Place of present confinement: Cook County Department of Correction
- E. Address: P.O. Box #089002 Chicago, IL 60608

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

**II. Defendant(s):**

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)

- A. Defendant: Simon #18864  
 Title: Police Officer  
 Place of Employment: Chicago Police Department 18<sup>th</sup> District
- B. Defendant: Simenez #14101  
 Title: Police Officer  
 Place of Employment: Chicago Police Department 18<sup>th</sup> District
- C. Defendant: Cianflone #18206  
 Title: Police Officer  
 Place of Employment: Chicago Police Department 18<sup>th</sup> District

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

## 11. Defendant (s) Continue:

D. Defendant: Eng # 19079  
 Title: Police Officer  
 Place of Employment: Chicago Police Department 18<sup>th</sup> District

E. Defendant: VanVranken # 2322  
 Title: Police Officer  
 Place of Employment: Chicago Police Department 18<sup>th</sup> District

F. Defendant: Fleming # 6063  
 Title: Police Officer  
 Place of Employment: Chicago Police Department 18<sup>th</sup> District

G. Defendant: Papaianov # 7644  
 Title: Police Officer  
 Place of Employment: Chicago Police Department 18<sup>th</sup> District

H. Defendant: Panagiotopoulos # 7915  
 Title: Police Officer  
 Place of Employment: Chicago Police Department 18<sup>th</sup> District

**III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:**

- A. Name of case and docket number: NA
- B. Approximate date of filing lawsuit: NA
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: NA
- D. List all defendants: NA
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): NA
- F. Name of judge to whom case was assigned: NA
- G. Basic claim made: NA
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): NA
- I. Approximate date of disposition: NA

**IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.**

## IV. Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

Now comes: The Plaintiff, RONNIE DANIELS, and sets forth his claims for Malicious Prosecution, Excessive and undue Force, as well as Intentional Infliction of Emotional Distress.

1) I, (The Plaintiff), RONNIE DANIELS, states that on August 24<sup>th</sup>, 2007, I was taken into custody by eight (08) officers of the 18<sup>th</sup> District Police station at around 11:00 P.M., and removed from 827 N. Cambridge a Chicago Housing Authority (C.H.A.) Lower Level Apartment Complex.

2) I was searched, cuffed and removed from the premises after being questioned as to, if I knew where drugs were and informed that, "if you give us something we will let you go".

3) I, then was removed from the premises and questioned as to whom someone named, "O.J." is and asked whether or not I knew if a car was his car or not that was parked on the street of Cambridge.

4) I was then taken to the 18<sup>th</sup> District station placed in a holding cell and two (02) hours later a officer came to the cell I was in and expressed, "Hey you're on parole, you make a good arrest, you've got a bag", while holding my Parolee I.D. card in hand.

5) I also feel that having been upended and body-slammed to the steps of 827 N. Cambridge followed by an officer standing on my neck and back instructing me to turn over, then proceeding to stand on my face and chest threatening to put a bullet in my ass, while another officer patted me down was an act of unfounded excessive force.

6) I was never mugged, either at the apartment, nor the 18<sup>th</sup> district station.

7) I, (The Plaintiff), RONNIE DANIELS, hereby attest to having suffered great distress, because of this blatant act of Excessive, and undue Force being imposed upon my person resulting in Mental and Emotional Suffering.

**V. Relief:**

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

I, (The Plaintiff), RONNIE DANIELS, do hereby request that this Honorable Court grant the relief sought in the amount of \$500,000.00 for compensatory damages, and another \$25,000.00 from each defendant for punitive damages, and another \$20,000.00 for Emotional Distress. Petitioner prays that this relief be granted both as to Law and Fact.

VI. The plaintiff demands that the case be tried by a jury. ☒ YES ☐ NO

**CERTIFICATION**

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this \_\_\_\_\_ day of May, 2008'

Ronnie Daniels  
(Signature of plaintiff or plaintiffs)

RONNIE DANIELS  
(Print name)

#20070064180  
(I.D. Number) — — — At Present Address Cook County Jail — — —  
Div. #05-1L-18 / P.O. Box #089002 / Chicago, IL 60608  
(Home Address)

4345 W. Monroe st.  
Chicago, Illinois 60624  
(Address)